

Parsons Behle & Latimer
Rew R. Goodenow, Bar No. 3722
50 West Liberty Street, Suite 750
Reno, NV 89501
Telephone: (775) 323-1601
Facsimile: (775) 348-7250

E-filed September 14, 2009

Attorneys for Celtic Bank

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEVADA

IN RE:

JOSEPH WILLIAM YAKUBIK, DARCIE
ANN YAKUBIK,

Debtor.

CASE No. BK-09-24688-LBR
(Chapter 11)

**REQUEST FOR SPECIAL NOTICE PURSUANT
TO BANKRUPTCY RULE 2002**

PLEASE TAKE NOTICE that Rew R. Goodenow of PARSONS BEHLE & LATIMER, on behalf of Celtic Bank, successor in interest to Silver State Bank, hereby requests, pursuant to Bankruptcy Rule 2002, special notice of all motions, applications, hearings, orders, writings, proceedings, and the like in the above-captioned matters including, but not limited to, the following:

(a) All matters and papers which must be sent to creditors, equity security holders, or the unsecured creditors' committee;

(b) All matters regarding relief from the automatic stay under Section 362 of the Bankruptcy Code;

1 (c) All matters regarding the use, the sale, or the lease of the Debtor's property under
2 Section 363 of the Bankruptcy Code;

3 (d) All matters regarding the obtaining of credit under Section 364 of the Bankruptcy
4 Code;

5 (e) All matters regarding executory contracts and unexpired leases under Section 365
6 of the Bankruptcy Code;

7 (f) All matters regarding the time requirements to file claims against the Debtor;

8 (g) All matters regarding reorganization of the Debtor, including a copy of any
9 disclosure statement or plan or reorganization;

10 (h) All matters regarding any adversary proceeding filed by or against the Debtor; and

11 (i) All documents filed by any party in any adversary proceeding.

12 Neither this request for notice, nor any subsequent appearance, pleadings, claim, proof of
13 claim, document, suit, motion, or any other writing or conduct shall constitute a waiver by these
14 creditors of the following rights:

15 (a) Right to have any final orders in any non-core matters entered only after de novo
16 review by a United States District Judge;

17 (b) Right to trial in any proceeding in which this right exists, whether the right be
18 designed legal or private, whether the right is asserted in any related case, controversy or
19 proceeding, notwithstanding the designation *vel non* of the proceeding as "core" under 28 U.S.C.
20 Section 157(b)(2)(H), and whether the right is asserted under statute or the United States
21 Constitution;

22 (c) Right to have the United States District Court withdraw the reference of this matter
23 in any proceeding subject to mandatory or discretionary withdrawal; or

24 (d) Other rights, claims, actions, defenses, set-offs, recoupments, or other matters to
25 which this party is entitled under any agreements, at law or in equity, or under the United States
26 Constitution.

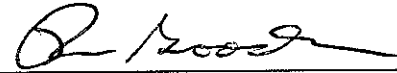
27 Filing this request for notice or participating in this bankruptcy proceeding shall not be
28 deemed to constitute a concession or admission of jurisdiction in this case or before this Court.

1 Celtic Bank further requests that all such notices be addressed to it as follows:

2 Rew R. Goodenow
3 PARSONS BEHLE & LATIMER
4 50 W. Liberty Street, Suite 750
5 Reno, NV 89501
6 (775) 323-1601
(775) 348-7250 (Facsimile)
Email: rgoodenow@parsonsbehle.com

7 Dated: September 14, 2009

PARSONS BEHLE & LATIMER

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9 By: 
10 Rew R. Goodenow,
11 Attorneys for Celtic Bank
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CERTIFICATE OF SERVICE

I hereby certify that on this 14th day of September, 2009, I caused to be filed and served through the Bankruptcy Court's ECF system, a true and correct copy of the foregoing REQUEST FOR SPECIAL NOTICE PURSUANT TO BANKRUPTCY RULE 2002, to:

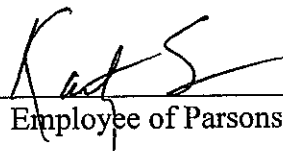
Timothy S. Cory, Esq.
Adam P. Bowler, Esq.
8831 W. Sahara Ave.
Lakes Business Park
Las Vegas, NV 89117
Tim.cory@corylaw.us
Attorney for Joseph William Yakubik and Darcie Ann Yakubik

U.S. Trustee – LV – 11
300 Las Vegas Blvd S.
Suite 4300
Las Vegas, NV 89101
USTPRegion17.lv.ecf@usdoj.gov

I also hereby certify that on this 14th day of September, 2009, I served a copy of the foregoing REQUEST FOR SPECIAL NOTICE PURSUANT TO BANKRUPTCY RULE 2002, via U.S. Mail, at Reno, Nevada, in a sealed envelope with first-class postage fully prepaid, addressed as follows:

BAC Home Loans Servicing, LP
c/o Polk, Prober & Raphael, a Law Corp.
20750 Ventura Blvd. #100
Woodland Hills, CA 91364

Saxon Mortgage
1270 Northland Drive, Suite 200
Mendota Heights, MN 55120



Employee of Parsons Behle & Latimer